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May 11, 2010  
(PBW Project No. 1597B)

VIA HAND DELIVERY

Mr. Tres Koenings  
Texas Commission on Environmental Quality  
Building F  
12100 Park 35 Circle  
Austin, TX 78753

Re: Supplement Information for Industrial Wastewater Permit Application Abbreviated  
Technical Report  
Gulfco Marine Maintenance Superfund Site, Freeport, Texas

Dear Mr. Koenings:

Per your request of May 6, 2010, please find enclosed supplemental information related to our April 27, 2010 Industrial Wastewater Permit Application Abbreviated Technical Report for discharge of accumulated water within an aboveground storage tank (AST) Tank Farm containment area at the above-referenced Site. Pastor, Behling & Wheeler, LLC (PBW) is submitting this information on behalf of LDL Coastal Limited LP (LDL), Chromalloy American Corporation (Chromalloy) and The Dow Chemical Company (Dow). As we discussed, the supplemental information includes a USGS map (Figure 1) with specific labeled items that you requested. To augment the items shown on the map and provide the information that you specified, I have also enclosed a table listing identified public water supply wells within a one-mile radius of the proposed discharge location (Table 1) and a figure showing Site monitoring well locations (Figure 2).

Thank you for the opportunity to submit this supplemental information. I appreciate expedited review of this information and the technical report. Should you have any questions, please do not hesitate to contact me.

Sincerely,

PASTOR, BEHLING & WHEELER, LLC



Eric F. Pastor, P.E.  
Principal Engineer

Enclosures

Mr. Tres Koenings  
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cc: Ms. Luda Voskov – Texas Commission on Environmental Quality  
Mr. Gary Miller – US Environmental Protection Agency  
Mr. Ray Merrell – Sequa Corporation  
Mr. Brent Murray – Environmental Quality, Inc.  
Mr. Donnie Belote - The Dow Chemical Company  
Mr. Allen Daniels - LDL Coastal Limited, LP  
Mr. F. William Mahley - Strasburger & Price, LLP  
Mr. James C. Morriss III - Thompson & Knight, LLP  
Ms. Elizabeth Webb - Thompson & Knight, LLP

**TABLE 1 - PUBLIC WATER SUPPLY WELLS WITHIN ONE MILE OF PROPOSED DISCHARGE  
AS LISTED IN TWDB AND TCEQ RECORDS**

| State Water Well ID <sup>1</sup> | Reported Total Depth (feet) | Reported Completion Date | Well Owner of Record | Field Verification/Current Status  |
|----------------------------------|-----------------------------|--------------------------|----------------------|--|
| 81-06-3E                         | 435                         | 3/3/1982                 | Surfside Water Works | Not Present based on field survey - Appears to be incorrectly located in well records. |
| 81-06-206 /<br>81-06-207         | 243                         | 1/1/1962                 | Freeport Marina      | Present - Reported to be capped and not in use (per Freeport LNG, 2004 <sup>3</sup> ). |
| 81-06-5J                         | 258                         | 10/10/1978               | Russel & Son, Inc.   | Not Present based on field survey - Appears to be incorrectly located in well records. |
| 81-06-606                        | 250                         | 11/29/1982               | Village of Surfside  |  |
| 81-06-301                        | 300                         | 1/1/1958                 | Village of Surfside  |  |
| 81-06-304                        | 435                         | 3/3/1982                 | Village of Surfside  |  |

Notes:

<sup>1</sup>Location identification on Figure 1.

<sup>2</sup> Search of Texas Water Development Board and Texas Commission on Environmental Quality records performed by Banks Information, Inc. (May 10, 2010).

<sup>3</sup>Freeport LNG Development, L. P. (Freeport LNG), 2004. Final Environmental Impact Statement, Freeport LNG Project. Docket No. CP03-75-000 FERC/EIS – 0164, May.





Mapped, edited, and published by the Geological Survey

Control by USGS, NOS/NOAA, USCE and Tennessee Valley Authority

Planimetry by photogrammetric methods from aerial photographs taken 1962. Topography by planimetric surveys 1964.

Superceded AMS Freeport map dated 1943.

Selected hydrographic data compiled from USCGS charts 887 (1964), and 1283 (1964).

This information is not intended for navigational purposes.

Polyconic projection. 1927 North American datum.

10,000-foot grid based on Texas coordinate system, south central zone.

1000-meter Universal Transverse Mercator grid ticks, zone 15, shown in blue.

Red tint indicates areas in which only landmark buildings are shown.

Fine red dashed lines indicate selected fence lines.

Revisions shown in purple compiled from aerial photographs taken 1974. This information not field checked.

Purple tint indicates extension of urban areas.



CONTOUR INTERVAL 5 FEET  
NATIONAL GEODETIC VERTICAL DATUM OF 1929  
DEPTH CURVES AND SOUNDINGS IN FEET-DATUM IS MEAN LOW WATER  
SHORELINE SHOWN REPRESENTS THE APPROPRIATE LINE OF MEAN HIGH WATER  
THE MEAN RANGE OF TIDE IS APPROXIMATELY 2 FEET

THIS MAP COMPLIES WITH NATIONAL MAP ACCURACY STANDARDS  
FOR SALE BY U.S. GEOLOGICAL SURVEY, DENVER, COLORADO 80225, OR RESTON, VIRGINIA 22092  
A FOLDER DESCRIBING TOPOGRAPHIC MAPS AND SYMBOLS IS AVAILABLE ON REQUEST



QUADRANGLE LOCATION

2895-434

FREEPORT, TEX.  
N2852.5 - W9515.7.5

1964  
PHOTOREVISED 1974  
AMS 894, IV NE-SERIES V882

GULFCO MARINE MAINTENANCE  
FREEPORT, BRAZORIA COUNTY, TEXAS

Figure 1

# SITE LOCATION MAP

|                                     |             |           |
|-------------------------------------|-------------|-----------|
| PROJECT 1997                        | BY ZGK      | REVISIONS |
| DATE MAY 2010                       | CHECKED EFP |           |
| PASTOR, BEHLING & WHEELER, LLC      |             |           |
| CONSULTING ENGINEERS AND SCIENTISTS |             |           |

## EXPLANATION

- GulfcO Marine Maintenance Site Boundary (approximate)
- Public Water Supply Well
- Public Water Supply Well Abandoned
- Public Water Supply Well Incorrectly Mapped in Water Well Records (Not Found During Field Survey)

## Notes

- Proposed discharge is accumulated water from within tank farm containment area to be discharged on a short-term basis during performance of a Non-time Critical Removal Action. No treatment prior to discharge is proposed.
- Proposed discharge is directly to a classified stream segment (Intracoastal Waterway - Segment No. 1111), so no discharge route is shown on this figure.
- See attached Table 1 for explanation of public water supply well numbering. Locations shown are based on Banks Information Inc. May 10, 2010 search of TWDB and TCEQ records and are approximate.
- 38 groundwater monitoring wells are present on-site. The locations of these wells are shown on the attached Figure 2.





### EXPLANATION

- |   |                                     |
|---|-------------------------------------|
| — Gulfco Marine Maintenance Site Boundary (approximate) | ● Monitoring Well Location - Zone B |
| ● Previous Monitoring Well Location                     | ○ Monitoring Well Location - Zone C |
| ⊕ Monitoring Well Location - Zone A                     |                                     |

Source of photo: H-GAC, Texas aerial photograph, 2006.

### GULFCO MARINE MAINTENANCE FREEPORT, BRAZORIA COUNTY, TEXAS

Figure 2  
**SITE MONITORING  
WELL LOCATIONS**

|                 |              |           |
|-----------------|--------------|-----------|
| PROJECT: 1597   | BY: ZGK      | REVISIONS |
| DATE: MAY, 2010 | CHECKED: EFP |           |

**PASTOR, BEHLING & WHEELER, LLC**  
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